August 4, 2022

Via Electronic Mail
Ann E. Misback
Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 2055

Chief Counsel's Office Attention: Comment Processing Office of the Comptroller of the Currency 400 7th Street, SW, Suite 3E-218 Washington, DC 20219

James P. Sheesley, Assistant Executive Secretary Attention: Comments RIN 3064-AF81 Federal Deposit Insurance Corporation 550 17th Street, NW Washington, DC 20429

Re: Question 13, Community Reinvestment Act Regulations Docket (R1769) and RIN (7100-AG29)

To Whom It May Concern:

My name is Tanner Merrill, and I am a former member of the University Growth Fund (UGF). I am writing to the Federal Reserve, Office of the Comptroller of the Currency (OCC) and Federal Deposit Insurance Corporation (FDIC) and re-submitting my original letter from 2020 when the OCC and FDIC proposed similar changes, for purposes of persuading the agencies to retain qualification language related to community development and job creation so that UGF can continue to operate and impact hundreds more students like myself. My support for UGF has only increased over the past two years as I continue to reap the benefits of being associated with such an amazing program and as I'm now watching countless new students, including many minorities, realize many of the same benefits I received when I was part of the program.

Thank you,

Tanner Merrill

Via Electronic Mail
Chief Counsel's Office
Attention: Comment Processing
Office of the Comptroller of the Currency
400 7th Street, SW, Suite 3E-218
Washington, DC 20219

Robert E. Feldman Executive Secretary Attention: Comments Federal Deposit Insurance Corporation 550 17th Street NW Washington, DC 20429

Re: Community Reinvestment Act Regulations (Docket ID OCC-2018-0008; RIN 1557-AE34; RIN 3064-AF22)

To Whom It May Concern:

My name is Tanner Merrill, and I am a former member of the University Growth Fund (UGF). I am writing to the Office of the Comptroller of the Currency (OCC) and Federal Deposit Insurance Corporation (FDIC) for purposes of persuading the agencies of the value that UGF adds to the life of a university student. As a low-income individual, getting through school with a wife and two children was a struggle. Due in great part to UGF, I was able to secure a job working for a prestigious venture capital firm in San Francisco and significantly improve my family's quality of life. Not only did I get a well-paying job because of UGF, but I developed professional skills and built a network of relationships that I believe will last for many years.

On top of what UGF has done for me personally and professionally, working at the fund gave me the opportunity to invest in the futures of others who have struggled financially (perhaps even more than I have). Many investments I worked on directly impacted the lives of the employees who worked at or were hired at the company with our investment often helping these new and existing employees in turn provide for themselves and their families). UGF adds value to the lives of the employees who work at these firms and affords individuals with average to low income and little opportunity the ability to support a family in fast-paced and enriching environments.

Funds and programs like UGF are important to the growth of the economy, especially in low to moderate income communities. UGF would not exist without the CRA credit that banks receive for investing as limited partners in the fund. My life has been directly impacted by my experience at UGF and has given me opportunities I may never have had otherwise. I hope the OCC and FDIC will consider rewording the new statute to maintain or include all language regarding economic development needed for banks to continue their impactful investments in innovative structures such as UGF.

Sincerely,

Tanner Merrill